



# California Regional Water Quality Control Board North Coast Region

**William R. Massey, Chairman**



**Linda S. Adams**  
Secretary for  
Environmental Protection

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**Arnold  
Schwarzenegger**  
Governor

September 20, 2006

Jim Hale  
Rio Dell Dept. of Public Works  
675 Wildwood Avenue  
Rio Dell, CA 95562

Dear Mr. Hale:

**Subject:** Response to Comments on Amendment to National Pollution Discharge Elimination System Permit; Order R1-2006-0021 Adopted on May 17, 2006

**File:** City of Rio Dell Waste Water Treatment Facility (WWTF)  
NPDES No. CA0022748, WDID No. 1B83134OHUM

On August 7, 2006 Regional Water Board staff received your comments related to proposed amendments to National Pollution Discharge Elimination System Permit, Order R1-2006-0021. No other comments have been received related to this item. We reviewed your comments, which requested 1) alternate interim limits for several constituents, 2) a reduction in the frequency of interim monitoring, and 3) re-rating of the facility from a major to a minor discharger. This letter provides our written response to comments and reflects the proposed alterations to the permit.

Final effluent limitations presented in Order R1-2006-0021 were developed in accordance with State Implementation Plan (SIP) Reasonable Potential Analysis methodology. Final limits will remain unchanged in the order. Section 2.2.1 of the SIP requires that ... "Numeric interim limitations for the pollutant must be based on current treatment facility performance..." Interim effluent limitations presented in the previously proposed changes to the order were derived using the highest concentration reported from the two existing sample data points for each constituent of concern.

The City's August 7 correspondence requested revisions to the proposed permit changes for interim effluent limitations. The City proposed, based on the limited data set available to derive the actual treatment performance level for copper based on a calculation which considers sampling data collected in drinking water from homes known to have copper piping (thought to contribute to sources of copper in the effluent) and the associated proportion of wastewater flow discharging from the treatment plant. The calculations presented appear to justify a reasonable

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argument that could represent actual treatment performance. Therefore, the interim limits for daily maximum and average monthly concentrations for copper will be adjusted.

For the remaining constituents, cyanide, dichlorobromomethane, and methyl tertiary butyl ether (MtBE), The City requested that final limits be imposed, in each instance where the final limit was greater than the highest observed limit that had been used to derive the interim limit. The final maximum daily limits for cyanide, dichlorobromomethane, and MtBE were all greater than the interim limits. Similarly, the final average monthly limit for MtBE was also greater than the actual treatment plant performance reported. Accordingly, the draft amendment to Order R1-2006-0021 will be changed to reflect final limits derived from the RPA in each instance described above. Interim limits based on observed treatment performance for average monthly concentrations of cyanide and dichlorobromomethane will remain as proposed in the July 7, 2006 draft amendments.

The City requested a sampling frequency reduction during the compliance schedule period from monthly to six times per year for copper, cyanide, dichlorobromomethane, and MtBE. The City indicated that this reduction would provide greater flexibility for source evaluation. Additional modifications requested by the City included a re-rating from a major to a minor discharger designation, as well as clarification of inconsistencies and typographic errors in the proposed amendment. The proposed amendment will be modified to reflect each of these requests.

In addition, as you know, on May 2, 2006, the State Water Board adopted State Water Board Order 2006-0003, a Statewide General Waste Discharge Requirements (WDRs) for Sanitary Sewer Systems. Order 2006-0003 requires that all public agencies that currently own or operate sanitary sewer systems apply for coverage under the General WDRs by November 2, 2006. Because the City's amended permit will be in affect after the November 2 deadline, changes have been made during revision of the permit as appropriate.

Due to the significant nature of the proposed alterations, the revised portions of the permit amendment will be re-opened for an additional 30-day public comment period. A notice of the public comment period accompanied by draft changes to the proposed permit will be sent to you under separate cover. This item will subsequently be heard before the Regional Water Board in a public meeting scheduled for 9:00 a.m. on December 6, 2006. Please contact me at (707) 576-2677 or [lbernard@waterboards.ca.gov](mailto:lbernard@waterboards.ca.gov) if you have any questions.

Sincerely,

Lisa Bernard  
Sanitary Engineering Associate

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